

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Jonathon Ziesmer,

Court File No. 12-CV-03031 (PAM/JJK)

Plaintiff,

vs.

**DEFENDANT'S
MOTIONS *IN LIMINE***

Derrick Lee Hagen,

Defendant.

TO: Plaintiff above named and Christopher J. Kuhlman, Esq., Kuhlman Law, PLLC,
Union Plaza, Suite 300, 333 Washington Avenue North, Minneapolis, MN 55401

NOW COMES Defendant Derrick Lee Hagen (“Defendant”), by and through the undersigned counsel, with his Motions *in Limine*. Defendant hereby moves the Court for the following relief:

MOTIONS

1. An Order precluding Plaintiff from introducing testimony from any of his treating physicians or other medical personnel.

2. An Order prohibiting Plaintiff, his counsel, or any non-expert witness from introducing testimony that Plaintiff has been diagnosed or self-diagnosed himself with any specific injury and/or medical condition or that such claimed injury and/or medical condition was caused by any action or inaction of Defendant.

3. An Order prohibiting Plaintiff, his counsel, or any witness from eliciting or presenting testimony, documentary evidence, information, allegations, or argument regarding the dismissal of criminal charges against Plaintiff.

4. An Order prohibiting Plaintiff, his counsel, or any witness from eliciting or presenting testimony, documentary evidence, information, allegations, or argument regarding any medical, cognitive, emotional, behavioral, learning, or other difficulties suffered by Plaintiff as a result of Alpha 1 Antitrypsin Deficiency.

5. An Order prohibiting Plaintiff, his counsel, or any witness from eliciting or presenting testimony, documentary evidence, information, allegations, or argument regarding the Minnesota State Patrol's defense and indemnification of Defendant.

6. An Order prohibiting Plaintiff, his counsel, or any witness from eliciting or presenting testimony, documentary evidence, information, allegations, or argument regarding the policies or procedures of the Minnesota State Patrol.

7. An Order prohibiting Plaintiff, his counsel, or any witness from eliciting or presenting testimony, documentary evidence, information, allegations, or argument regarding publicized events of police misconduct.

8. An Order sequestering non-party witnesses from opening statements and the testimony of other witnesses pursuant to Federal Rule of Evidence 615.

Signature on Page 3

Dated: July 20, 2015

OFFICE OF THE ATTORNEY GENERAL
State of Minnesota

s/ **Kathryn A. Fodness**

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